

United States Department of Justice
Office of the United States Trustee
1100 Commerce St. Room 976
Dallas, Texas 75242
(214) 767-1075

Erin Marie Schmidt,
for the United States Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

| | | |
|-------------------------------------|---|----------------------------------|
| IN RE | § | |
| | § | |
| JENNIFER HALVERSON, | § | CASE NO. 19-41682-ELM-7 |
| | § | |
| DEBTOR. | § | |
| <hr/> | | |
| WILLIAM T. NEARY, | § | |
| UNITED STATES TRUSTEE, | § | |
| | § | |
| PLAINTIFF, | § | ADVERSARY NO. 19-4088-ELM |
| | § | |
| v. | § | |
| | § | |
| THE CROSLAND LAW FIRM, PLLC, | § | HON. EDWARD LEE MORRIS |
| SETH P. CROSLAND, AND | § | |
| PATRICK HOPKINS, | § | |
| | § | |
| DEFENDANTS. | § | |

TO THE HONORABLE EDWARD LEE MORRIS, UNITED STATES BANKRUPTCY JUDGE:

The United States Trustee for Region 6 files his witness and exhibit list in connection with the following matters scheduled for hearing on January 28, 2020 at 9:30 a.m.

1. *Motion for Entry of Default Judgment Against Defendants Seth Crosland and the Crosland Law Firm, PLLC* [docket no. 16]; and
2. *Motion for Entry of Agreed Judgment Against Defendant Patrick Hopkins* [docket no. 18].

Witnesses

1. Patrick Hopkins.
2. Seth Crosland.
3. Jennifer Halverson.
4. Any other witness as designated or called by Defendants.

Exhibits

| UST Exhibit | Description | Admitted |
|--------------------|--|-----------------|
| 1 | Docket Sheet for <i>In re Jennifer Halverson</i> , Case No. 19-41476-ELM-7 (Bankr. N.D. Tex.) | |
| 2 | Petition filed April 9, 2019 [19-41476, docket no. 1] | |
| 3 | <i>Certificate of Counseling</i> dated January 17, 2018 [19-41476, docket no. 2] | |
| 4 | <i>Order Dismissing Case for Failure to Obtain Credit Counseling</i> entered April 10, 2019 [19-41476, docket no. 6] | |
| 5 | Docket Sheet for <i>In re Jennifer Halverson</i> , Case No. 19-41504-MXM-7 (Bankr. N.D. Tex.) | |
| 6 | Petition, Schedules, SOFA, etc. filed April 11, 2019 [docket no. 19-41504, docket no. 1] | |
| 7 | <i>Certificate of Counseling</i> dated January 17, 2018 [19-41504, docket no. 2] | |
| 8 | <i>Certificate of Counseling</i> dated April 18, 2019 [19-41504, docket no. 11] | |
| 9 | <i>Order Dismissing Case for Failure to Obtain Credit Counseling</i> entered April 10, 2019 [19-41504, docket no. 12] | |
| 10 | Docket Sheet for <i>In re Jennifer Halverson</i> , Case No. 19-41682-ELM-7 (Bankr. N.D. Tex.) | |
| 11 | Petition filed April 26, 2019 [19-41682, docket no. 1] | |
| 12 | <i>Certificate of Counseling</i> dated April 18, 2019 [19-41682, docket no. 2] | |
| 13 | Schedules filed May 2, 2019 [19-41682, docket no. 13] | |
| 14 | Statement of Financial Affairs filed May 2, 2019 [19-41682, docket no. 14] | |
| 15 | Rule 2016(b) Statement filed May 2, 2019 [19-41682, docket no. 16] | |
| 16 | Transcript of June 19, 2019 § 341 Meeting [19-41682] | |
| 17 | Docket Sheet for <i>Neary v. Crosland</i> , Adv. No. 19-4088-ELM (Bankr. N.D. Tex.) | |
| 18 | <i>United States Trustee's Complaint to Examine Fees Paid to Debtor's Counsel, to Cancel Fee Agreements Between Debtor</i> | |

| UST Exhibit | Description | Admitted |
|-------------|---|----------|
| | <i>and Counsel, for Disgorgement of Fees, and for Imposition of Injunctive Relief, under 11 U.S.C. § 329, 526, and 528, and Federal Rules of Bankruptcy Procedure 2016 and 2017</i> filed August 19, 2019 [19-4088, docket no. 1] | |
| 19 | Combined Executed Summons against Patrick Hopkins, Seth P. Crosland, and The Crosland Law Firm, PLLC [19-4088, docket nos. 7, 8, and 9]. | |
| 20 | <i>Clerk's Entry of Default</i> with respect to Defendants The Crosland Law Firm, PLLC and Seth P. Crosland [19-4088, docket no. 14] | |
| 21 | <i>Notice of Hearing</i> filed December 30, 2019 [19-4088, docket no. 19] | |
| 22 | Chapter 7 Bankruptcy Pre-Petition Services Agreement signed April 1, 2019 by Seth P. Crosland and Jennifer Halverson | |
| 23 | Chapter 7 Bankruptcy Post-Petition Services Agreement signed April 9, 2019 by Seth P. Crosland and Jennifer Halverson | |
| 24 | Recurring Payment Authorization and Consent Form signed April 9, 2019 by Jennifer Halverson (Redacted) | |
| 25 | Chapter 7 Bankruptcy Pre-Petition Services Agreement signed April 25, 2019 by Seth P. Crosland and Jennifer Halverson | |
| 26 | Chapter 7 Bankruptcy Post-Petition Services Agreement signed April 26, 2019 by Seth P. Crosland and Jennifer Halverson | |
| 27 | Canceled Check No. 975033 from the Crosland Law Firm PLLC to Jennifer Halverson for \$236.25 | |
| 28 | Fresh Start Funding Agreement With Seth Crosland, dated December 8, 2018 | |
| 29 | Email correspondence between patrick@croslandlawfirm.com and Erin.Schmidt2@usdoj.gov from July 19, 2019 through July 24, 2019 | |
| 30 | Docket Sheet for <i>In re Jerry Barta</i> , 17-43648-MXM-7 (Bankr. N.D. Tex.) | |
| 31 | Docket Sheet for <i>Neary v. Crosland (In re Crosland)</i> , Adv. Proc. 18-4074-MXM (Bankr. N.D. Tex.) | |
| 32 | <i>Complaint of the United States Trustee Seeking Fines and Injunctive Relief Against Defendant Seth Crosland and DVH Law Group, LLC, in Accordance with 11 U.S.C. § 526</i> filed February 9, 2018 [18-4074, docket no. 1] | |
| 33 | <i>Order Accepting Agreement Between the U.S. Trustee and Seth Crosland</i> entered April 19, 2018 [18-4074, docket no. 13] | |
| 34 | Docket Sheet for <i>In re Roland Rowley and Betty Cannon-Rowley</i> , Case No. 19-10035-RLJ-7 (Bankr. N.D. Tex.) | |
| 35 | <i>United States Trustee's Motion to Review Debtors' Transactions with Attorney under 11 U.S.C. § 329</i> filed April 25, 2019 [19-10035, docket no. 15] | |
| 36 | <i>Order on the United States Trustee's Motion to Review Debtors' Transactions with Attorney under 11 U.S.C. § 329</i> signed June 10, 2019 [19-10035, docket no. 18] | |
| 37 | Docket Sheet for <i>In re Nathan Ryan Sawyer</i> , Case No. 19-50078-RLJ-13 (Bankr. N.D. Tex.) | |

| UST Exhibit | Description | Admitted |
|-------------|--|----------|
| 38 | <i>Trustee's Motion to Determine Compensation of Attorney</i> filed April 22, 2019 [19-50078, docket no. 26] | |
| 39 | <i>Order on Trustee's Motion to Determine Compensation of Attorney</i> signed May 23, 2019 [19-50078, docket no. 31] | |
| 40 | Email correspondence between AUST Timothy O'Neal at Timothy.W.O'Neal@usdoj.gov and Seth Crosland at seth@croslandlawfirm.com | |
| 41 | Docket Sheet for <i>Neary v. Crosland</i> , Misc. Proc. 19-402 (Bankr. E.D. Tex.) | |
| 42 | <i>U.S. Trustee's Motion for Order to Show Cause Why Sanctions Should Not Issue as to Counsel Seth P. Crosland</i> filed July 22, 2019 [19-402, docket no. 1] | |
| 43 | <i>Order Granting the U.S. Trustee's Motion for Order to Show Cause Hearing as to Seth P. Crosland</i> entered July 25, 2019 [19-402, docket no. 3] | |
| 44 | <i>Agreed Order Granting Sanctions and for Further Relief on Court's Order to Show Cause as to Counsel Seth P. Crosland</i> entered August 20, 2019 [19-402, docket no. 8] | |
| 45 | Docket Sheet for <i>In re Rhonda Johnson</i> , Case No. 19-31029-SGJ-13 (Bankr. N.D. Tex.) | |
| 46 | <i>United States Trustee's Motion to Review Debtors' Transactions with Attorney under 11 U.S.C. § 329</i> filed September 13, 2019 [19-31029, docket no. 68] | |
| 47 | <i>Order on the United States Trustee's Motion to Review Debtors' Transactions with Attorney under 11 U.S.C. § 329</i> signed October 25, 2019 [19-31029, docket no. 78] | |
| 48 | Docket Sheet for <i>In re Regina Ruiz</i> , Case No. 17-10696-TMD (Bankr. W.D. Tex.) | |
| 49 | <i>Chapter 13 Trustee's Motion to Examine Fees</i> filed August 10, 2017 [17-10696, docket no. 14] | |
| 50 | <i>Order Granting Trustee's Motion to Examine Fees</i> signed September 20, 2017 [17-10696, docket no. 24] | |
| 51 | <i>Response to Order to Show Cause</i> filed September 29, 2017 [17-10696, docket no. 26] | |
| 52 | State Bar of Texas Find a Lawyer Search Result for Seth Parker Crosland, retrieved January 22, 2020 | |
| 53 | U.S. District Court for the Northern District of Texas Public Attorney Status Report for Seth Crosland, retrieved January 22, 2020 | |
| 54 | List of cases in which Seth Crosland was attorney or party in U.S. Bankruptcy Court for the Northern District of Texas, retrieved from ECF/PACER on January 23, 2020 | |
| 55 | List of cases in which Seth Crosland was attorney or party in U.S. District Court for the Northern District of Texas, retrieved from ECF/PACER on January 23, 2020 | |
| 56 | Texas Real Estate Commission Agent License Search Result for Seth Crosland, retrieved January 22, 2020 | |

| UST Exhibit | Description | Admitted |
|-------------|--|----------|
| 57 | U.S. District Court for the Northern District of Texas Public Attorney Status Report for Patrick Hopkins, retrieved January 22, 2020 | |
| 58 | List of cases in which Patrick Hopkins was attorney or party in U.S. Bankruptcy Court for the Northern District of Texas, retrieved from ECF/PACER on January 23, 2020 | |
| 59 | <i>In re Kuykendall</i> , 501 B.R. 311 (Bankr. S.D. Tex. 2013) | |

The United States Trustee reserves the right to use any exhibits either designated by other parties and/or admitted by the Court. The United States Trustee further reserves the right to introduce documents to use for impeachment. The United States Trustee further reserves the right to amend this witness and exhibit list.

DATED: January 23, 2020

Respectfully submitted,

WILLIAM T. NEARY
UNITED STATES TRUSTEE

/s/ Erin Marie Schmidt
Erin Marie Schmidt
Texas State Bar No.24033042
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Dallas, Texas 75242
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(214) 767-1075

Certificate of Service

I certify that on January 23, 2020, I sent copies of the foregoing document with PDF versions all exhibits on a computer disk to the following persons via Federal Express for January 24, 2020 delivery:

/s/ Erin Marie Schmidt
Erin Marie Schmidt

R. David Weaver
Weaver Law, PLLC
1601 East Lamar Boulevard Ste. 102
Arlington, TX 76011

Seth Crosland and the
The Crosland Law Firm, PLLC
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Suite 205B
Hurst, TX 76054